

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FILED

In re: Finish Robotics, Inc.,

) Case No. 24-21091 SEP 16 A 9:55

) Chapter 7

Debtor.

)

)

CLERK
U.S. BANKRUPTCY COURT
PITTSBURGH

Lead Pencil LLC,

)

)

Objecting Party,

)

)

v.

)

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FI Fund I, a Series of 99 Tartans, LP,

)

)

Respondent.

)

OBJECTION TO PROOF OF CLAIM

Lead Pencil LLC, a creditor in the above-captioned case, hereby objects to Proof of Claim No. 11 filed by FI Fund I, a Series of 99 Tartans, LP ("Respondent") on August 27, 2024 in the amount of \$181,066.41 ("the Claim").

FACTUAL BACKGROUND

1. Respondent's claim of \$181,066.41 consists of \$168,595.00 in principal, and \$12,471.41 in accrued interest. The exact dates used for this interest calculation were not provided.
2. Documentation attached to Respondent's claim does not have a fully specified date, but appears to be around July 2023.
3. Interest calculation of \$12,471.41 amounts to 9 months of simple interest at 10%.
4. Debtor filed for bankruptcy as of May 3, 2024
5. On information and belief Respondent has previously invested in Finish Robotics, with a deposit of \$204,595 made to Finish Robotics account on May 13, 2022.
6. On or about November 29, 2022 Respondent subsequently filed a lawsuit against Ricky Houghton personally, seeking to have the

full investment amount returned. See case ID GD-22-014492 filed in Allegheny County, Pennsylvania.

7. On information and belief Finish Robotics recorded a payment of \$36,000 to Respondent on August 1, 2023. The lawsuit changed to Discontinued status as of August 7, 2023. The proof of claim filed by Respondent shows an initial principal amount of \$36,000 less than the investment made in May 2022.
8. On information and belief the transaction log of Finish Robotics, attached hereto as Exhibit A, does not show any payment in the amount of \$168,595.00 as listed in the proof of claim from Respondent. There also does not appear to be any incoming transfers from Respondent around the time of the date on the proof of claim filed.

GROUND FOR OBJECTION

The Claim should be disallowed because Respondent never paid the initial principal amount of the alleged debt based on the documents filed.

LEGAL ARGUMENT

Under basic contract law, a valid contract requires consideration from both parties. Consideration is something of value given by both parties to a contract that induces them to enter into the agreement. In this case, if the creditor never paid the initial principal, there was no consideration provided, and thus no valid contract was formed.

If the Respondent intended to connect this claim to an amended investment from May 2022, the provided proof is insufficient, as the original agreement was not provided, and the agreement that led to the \$36,000 return payment was also not provided for other creditors to inspect.

RELIEF REQUESTED

WHEREFORE, Lead Pencil LLC respectfully requests that the Court:

1. Enter an order disallowing Proof of Claim No. 11 in its entirety;
2. Grant such other and further relief as the Court deems just and proper.

Dated: September 5, 2024

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael B. Donohue".

Michael Donohue, manager
Lead Pencil LLC
Pro se

EXHIBIT A

Transaction log of Debtor's Brex account from July 1, 2023 to September 30, 2023.

Date	To/From	Amount	Balance	Memo	External Memo	Originator	Identific	Initiated By	Method	Status
9/30/23	Brex Card	-2058.78	50345.95							
9/28/23	GUSTO	-2131.56	52404.73		TAX 150775	6semjv8731g	Brex		ACH	Complete
9/28/23	GUSTO	-3705.35	54536.29		NET 150813	6semjv8731f			ACH	Complete
9/27/23	GUSTO	-5000	58241.64		CND 138020	6semjv8a71d			ACH	Complete
9/27/23	GUSTO	-6250	63241.64		CND 138020	6semjv8ae7c			ACH	Complete
9/26/23	PRIMEPAY	-15	69491.64		DEBCARDTX	FR4095872194095			ACH	Complete
9/21/23	CHUBB-SCI	-2719.45	69506.64		DIRECT DEB	SCI			ACH	Complete
9/19/23	Carcharodon LLC	1611.08	72226.09		Terex Reimbursement		Colleen Faller		ACH return	Complete
9/19/23	SSBTRUSTOPS	-1314.58	70615.01		P/R CONTR				ACH	Complete
9/19/23	PRIMEPAY	-1728	71929.59		DEBCARDTX	FR4095872194095			ACH	Complete
9/19/23	Lone Oak Technology, LLC	-4200	71946.87		rent september		Colleen F		Check	Complete
9/18/23	Carcharodon LLC	-1611.08	76146.87		Terex Reimbursement		Colleen Faller		ACH	Complete
9/18/23	Robert Myer	-2000	77757.95		September payment		Colleen F		Check	Complete
9/15/23	Karen T.W. Sutton	-3215	79757.95	Patent Help	Finish Robotics 815		Colleen Faller		Check	Complete
9/14/23	GUSTO	-2131.58	82972.95		TAX 808062	6semjv4t9m			ACH	Complete
9/14/23	GUSTO	-3705.34	85104.53		NET 807837	6semjv4t9l			ACH	Complete
9/14/23	PRIMEPAY	-14.23	88809.87		DEBCARDTX	FR4095872194095			ACH	Complete
9/11/23	PRIMEPAY INVOICE	-50	88824.1		INVOICE	00000WzhAAE001			ACH	Complete
9/6/23	ZR INVESTMENTS LLC	25000	88874.1		ROCKY CHERRY				Wire	Complete
9/6/23	GUSTO	-210.79	63874.1		FEE 643599	6semjv35570			ACH	Complete
9/6/23	SSBTRUSTOPS	-1314.58	64084.89		P/R CONTR				ACH	Complete
8/30/23	GUIDELINE RETIRE	-65	65399.47		GUIDELINE	ST-D6G5L8Q8U4H2			ACH	Complete
8/30/23	GUSTO	-3705.36	65464.47		NET 456158	6semjv0vtua			ACH	Complete
8/30/23	Brex Card	-2131.54	69169.83		TAX 456123	6semjv0vtub			ACH	Complete
8/29/23	GUSTO	-3036.06	71301.37				Brex		Card payer	Complete
8/25/23	Carcharodon LLC	-6250	74337.43		CND 435581	6semjv14129			ACH	Complete
8/23/23	Terex USA, LLC	-694	80587.43		Finish Robotics INV 7345481		Colleen Faller		Check	Complete
8/23/23	PRIMEPAY	1	81281.43		DEBCARDTX	FR4095872194095			ACH return	Complete
8/22/23	Terex USA, LLC	-37.17	81280.43		Finish Robotics INV 7345481		Colleen Faller		ACH	Complete
8/22/23	Reed Smith LLP	-1	81317.6	Finish Robotics INV 73454	Finish Robotics Payment- please put this		Colleen Faller		ACH	Complete
8/21/23	SSBTRUSTOPS	-2500	81318.6		P/R CONTR				ACH	Complete
8/17/23	EPD - NASAA	-1314.58	83818.6		EPD FILING	780829			ACH	Complete
8/16/23	Lone Oak Technology, LLC	-985	85133.18		august rent		Colleen Faller		Check	Complete
8/16/23	Reed Smith LLP	-4000	86118.18		Finish Robotics payment		Colleen Faller		Check	Complete
8/15/23	SSBTRUSTOPS	-2500	90118.18		P/R CONTR				ACH	Complete
8/14/23	Karen T.W. Sutton	-636	92618.18							
8/14/23	GUSTO	-1400	93254.18		TAX 101963	6semjusr2rq	Colleen Faller		Check	Complete
8/14/23	GUSTO	-2131.56	94654.18		NET 104115	6semjusr2rp			ACH	Complete
8/14/23	PRIMEPAY	-3705.35	96785.74		DEBCARDTX	FR4095872194095			ACH	Complete
8/14/23	PRIMEPAY	-251	100491.09		DEBCARDTX	FR4095872194095			ACH	Complete
8/11/23	PRIMEPAY	-19.99	100742.09		DEBCARDTX	FR4095872194095			ACH	Complete

8/10/23 GUSTO	-1406.46	100762.08	NET 006339	6semjusr300	ACH	Complete
8/10/23 PRIMEPAY INVOICE	-50	102168.54	INVOICE	00000tFn8AAE001	ACH	Complete
8/10/23 GUSTO	-738.7	102218.54	TAX 006532	6semjusr30p	ACH	Complete
8/7/23 Premium S.A.	-1384.37	102957.24	Finish Robotics- 7123T - ODS-1500 24Vdc Colleen Faller Wire	ST-B1F3W1K1F0U4	ACH	Complete
8/7/23 GUIDELINE RETIRE	-65	104341.61	GUIDELINE	6semjusr171v	ACH	Complete
8/4/23 GUSTO	-197.95	104406.61	FEE 936864		ACH	Complete
8/4/23 SSBTRUSTOPS	-68.15	104604.56	P/R CONTR		ACH	Complete
8/3/23 MAGNESIUM VENTURES, L	75000	104672.71	incoming transfer from MAGNESIUM VENTURES, LLC		Wire	Complete
8/1/23 99Tartans	-36000	29672.71	99T Settlement		Wire	Complete
8/1/23 HIGHMARK	-3261.36	65672.71	EDI PAYMTS	39906395	ACH	Complete
8/1/23 HIGHMARK	-3261.36	68934.07	EDI PAYMTS	39907377	ACH	Complete
8/1/23 PRIMEPAY	-34.52	72195.43	DEBCARDTX	FR4095872194095	ACH	Complete
7/31/23 ANDREW J KUZNESKI	24500	72229.95	incoming transfer from ANDREW J KUZNESKI		Wire	Complete
7/31/23 MICHELLE L GALLUZZO	10000	47729.95	TOM GALLUZZO		Wire	Complete
7/28/23 EDWARD R ENGLER	32500	37729.95	INVESTING INTO BUSINESS		Wire	Complete
7/28/23 GUSTO	-176.59	5229.95	TAX 732310	6semjupe46v	ACH	Complete
7/26/23 Lone Oak Technology LLC	-600.69	5406.54	NET 732294	6semjupe46u	ACH	Complete
7/26/23 ANDREW J KUZNESKI	-4000	6007.23	Finish Robotics Rent July		Wire	Complete
7/26/23 PRIMEPAY	8000	10007.23	incoming transfer from ANDREW J KUZNESKI		Wire	Complete
7/25/23 PRIMEPAY	-156.38	2007.23	DEBCARDTX	FR4095872194095	ACH	Complete
7/21/23 HIGHMARK	-3261.36	2067.23	DEBCARDTX	FR4095872194095	ACH	Complete
7/17/23 PRIMEPAY	-54.52	2223.61	EDI PAYMTS	39775973	ACH	Insufficient funds
7/13/23 GUSTO	-60	2278.13	P/R CONTR		ACH	Complete
7/13/23 GUSTO	-491.94	2338.13	DEBCARDTX	FR4095872194095	ACH	Complete
7/12/23 PRIMEPAY	-129.89	2830.07	NET 349923	6semjujdrh5	ACH	Complete
7/10/23 PRIMEPAY INVOICE	-157.86	2959.96	TAX 349748	6semjujdrh6	ACH	Complete
7/7/23 GUSTO	-50	3117.82	DEBCARDTX	FR4095872194095	ACH	Complete
7/6/23 GUSTO	-34.89	3167.82	INVOICE	00000t7HSAAY001	ACH	Complete
7/6/23 GUIDELINE RETIRE	-197.95	3202.71	TAX 256840	6semjujkrj3	ACH	Complete
7/5/23 CHUBB-SCI	-65	3400.66	FEE 179792	6semjujkskl	ACH	Complete
7/5/23 SSBTRUSTOPS	-401.04	3465.66	GUIDELINE	ST-SAD20909Q1W3	ACH	Complete
7/5/23 PRIMEPAY	-77.89	3866.7	INS PREM	SCI	ACH	Complete
	-75	3944.59	P/R CONTR		ACH	Complete
			DEBCARDTX	FR4095872194095	ACH	Complete

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of September, 2024, I caused a true and correct copy of the foregoing Objection to Proof of Claim to be served via First Class mail upon the following:

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Michael Donohue, Manager, pro se
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